

REMARKS

Claims 1-7, 11, 13-15, 19-31, and 35-50 are pending in this application. Claim 49 is amended, claims 22-24 and 45-46 are cancelled, and claims 51-55 are added herein. Claims 1, 19, 35, 41 and 50 are independent.

Claim 49 stands rejected under 35 USC § 112 (first paragraph) as indefinite. Claim 49 is amended to address the noted concern.

Claims 1-6, 19-24, 27-29, 35, 37-38, 40-42, 44, 46 and 50 stand rejected under 35 USC § 103(a) as obvious over Chang et al. (U.S. Patent No. 5,884,288) in view of Sharpe et al. (U.S. Patent No. 5,222,018). Claims 7, 25-26, 36 and 47 stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Pintsov et al. (U.S. Patent No. 5,612,889). Claims 11, 30 and 48 stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Mersky et al. (U.S. Patent No. 6,119,106). Claims 13-14 and 39 stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Anderson et al. (U.S. Patent No. 6,021,202). Claims 15 and 49 stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Anderson et al. (U.S. Patent No. 6,021,202) and Hilt et al. (U.S. Patent No. 5,465,206). Claims 22-24 and 45-46 are cancelled without prejudice or disclaimer. The rejections of the other claims are respectfully traversed.

The Examiner argues that Chang's disclosure of an electronic bill payment system which receives payment requests from payors, as disclosed in column 2, lines 39-44, corresponds to the require receipt of respective sets of payment requests, each set corresponding to an associated set of payors requesting

payments to a plurality of payees, as required by each of the independent claims.

However, contrary to the Examiner's contention, Chang discloses only the receipt of payment requests directly from an associated payor, and lacks any suggestion of receiving sets of payment requests as required by the independent claims. More particularly, Chang, and hence the proposed combinations, fail to teach or suggest the receipt of respective sets of payment requests, with each set corresponding to an associated set of payors requesting payments to a plurality of payees. Rather, Chang explicitly discloses that payment requests are received from individual payors, see column 4, lines 44-51. Hence, to the extent Chang can be read to receive a set of payment requests (which it is respectfully submitted is at best questionable), each set of payment requests would correspond to only a single associated payor requesting payments to a plurality of payees, and not to a set of multiple payors requesting payments to a plurality of payees. Accordingly, the required receipt of respective sets of payment requests, with each set corresponding to an associated set of payors requesting payments to a plurality of payees, distinguishes each of the independent claims over the applied combination of art.

Other features recited in the dependent claims are believed to further and independently distinguish over the applied art combinations. Such features include, but are not necessarily limited to, the following.

Claims 2, 3, 21, and 42-43 require that differently formatted sets of payment request be normalized. The Examiner relies on Chang, column 9, lines 1-12, as disclosing such normalization. The referenced text relates to formatting the received payment request information for further processing, but lacks any suggestion that this received payment request

information is or should be normalized. Rather, as disclosed in Chang, column 8, lines 56-67, the format of the received payment request information is predefined by the recipient bank and therefore is always the same. Hence, Chang does not receive differently formatted sets of payment request, and thus the proposed combination of art has no need to, and therefore does not suggest, a normalization of differently formatted sets of payment request.

Claims 7-10, 25-27, 36-38 and 47 require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record. With regard to claims 7, 25-27, 36-38 and 47 (it appears that claims 8-10 were inadvertently not mentioned), as understood the Examiner points to Pintsov (column 7, lines 49-52) as disclosing the processing of payment information to identify a zip code.

In the referenced text, Pintsov discloses altering the stored zip code due to an address change, not processing information to identify an eleven-digit zip code which is then used to access or retrieve a payee record. That is Pintsov's mail processing assigns a delivery destination code (e.g. a stored zip code) based on a unique identifier and, as disclosed in column 7, lines 49-56, alters the stored zip code if there has been an address change. This has nothing whatsoever to do with using payment information to identify an eleven-digit zip code, and in turn using this identified zip code to access or retrieve a payee record, and it is unclear how the Examiner contends that it does.

Pintsov describes using a unique ID other than the zip code (see for example Figure 6 and column 12, line 51, through column 13, line 15) to access a stored payee record to obtain a zip code and prints the zip code on a piece of mail. The unique ID

is also, when appropriate, used to access a stored payee change of address record to obtain a changed zip code, which is substituted for the original zip code in the stored payee record. Hence, the applied combination of art is clearly distinguishable.

In addition, the Examiner argues that accessing a database to locate payee information corresponding to the eleven-digit zip code would have been obvious to those skilled in the art. However, the claims do not simply recite using a zip code for accessing a database to locate payee information corresponding to the zip code. Rather, the claims require using a zip code, which is identified by processing information, to locate or retrieve a file or record which has an associated corresponding zip code.

Claims 11, 28-30, 40 and 48 require identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed. The Examiner points to Mersky (column 9, lines 8-32) and Chang (column 4, lines 1-11 and 37-43, and column 6, line 62, through column 7, line 15) as disclosing the use of a account number to identify a single remittance center to which payment is directed.

However, the relevance of the referenced text in column 4, lines 1-11, of Chang is unclear since the text simply defines "Payee Bank". The referenced text in column 4, lines 37-43, of Chang relates to the transmission of bills, not payments. The referenced text in column 6, line 62, through column 7, line 15, of Chang lacks any disclosure of identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed. In fact, in column 7, lines 19-33, Chang explicitly discloses that the electronic checks are transmitted to the

designated payee, implicitly indicating that there is only one address per payee for remittance of payments.

Mersky, in column 9, lines 8-32, discusses the scanning of bill information. As described therein, the bill information may include bar codes or alphanumeric characters, which are scanned to digitize the bill information. However, the referenced text lacks any disclosure of identifying scanned characters of an account number to select or identify a single delivery point to which payment is directed, or processing a scanned account number to select or identify a single delivery point to which payment is directed. Hence, the relevance of Mersky is not understood.

Thus, it is respectfully submitted that the applied art, taken in any combination, fails to teach or suggest the required identifying of characters of an account number or processing of a received account number to select or identify a single delivery point to which payment is directed.

Claims 13-15, 31, 39 and 49, require transforming the account number included in a payment request into an altered account number according to the alteration rules. The Examiner points to Anderson (column 10, line 55, through column 11, line 13, as disclosing the required altering of an account number.

The referenced text of Anderson discloses that documents are designed to comply with existing customs, protocols and legal rules. As described in column 10, lines 39-55, the documents are divided into content blocks associated with the logic fields specific to these blocks. Hence, what the referenced text discloses is that the content blocks should be applied to a particular document based on the existing customs, protocols and legal rules applicable to that document. This is clarified by the example described in column 11, lines 7-12, in which the content block for "pay to the order of" of a check is

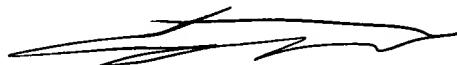
defined so that the software will treat the content of the block as an identification of the payee. Anderson, and hence the applied art combinations, do not suggest that there is any alteration of the received data which populate a block, but rather that data as received is used to populate the blocks and the logic fields associated with the blocks allow the software to determine what the type of data is contained within the block (e.g. "XOX112" in a particular block is the received account number). Accordingly, it is respectfully submitted that there is nothing in the referenced text of Anderson, or the applied combination of art, to suggest that a received account number be altered based on alteration rules.

New claims 51-55 are added as dependencies of independent claims 1, 19, 35, 41 and 50 to further define the sets of payment requests to be sets of consolidated payment requests.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,
Lalos & Keegan



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APPENDIX TO AMENDMENT FILED IN RESPONSE TO OFFICIAL ACTION DATED

11/21/00 SETTING FORTH AMENDED CLAIM(S) WITH ADDITIONS

UNDERLINED AND DELETIONS BRACKETED

49. (Amended) The article of manufacture according to claim 41, wherein:

each of the payment requests includes a payor's account number with a payee; and

the computer programming is further readable to cause the at least one computer to:

determine if the received account number conforms with validation rules corresponding to payee values for fields of the account number;

transform the validated account number into an altered account number according to [the] alteration rules corresponding to a payee account number, and

transmit the altered account number to the payee to notify a payee of a payment based on the payment directions.